

Serial No. 10/642,584

Amendment Dated: January 4, 2006

Reply to Office Action Mailed: August 24, 2006

Attorney Docket No. 056208.542669US

**REMARKS**

Reconsideration and allowance of this application are respectfully requested in view of the above-amendment and the discussion below. The present invention has been discussed in the amendment filed June 5, 2005 which is incorporated herein by reference.

Claims 1, 2, 9 and 10 are now rejected under 35 USC 103 as unpatentable over the newly cited references to Franz et al (US 4,161,775), Sunaga et al (US 6,661,134) and Asao et al (US 6,198,187) while claims 3-6 are rejected over the above references and further in view of Kershaw et al (US 5,818,133).

Additionally Claims 7 and 8 are rejected over the above references and further in view of Suzuki et al (JP410209357).

In response to these rejections, Applicants have canceled claims 9 and 10 and incorporated the subject matter into independent claims 1 and 2 respectively. No new issues are raised by this amendment. Accordingly each independent claim recites that the heat sinks are completely separated into positive and negative U, V, and W phases.

The Franz reference has been cited for showing the claimed separation. However Franz does not disclose that the heat sinks are separated into positive and negative sides.. Figure 2 of Franz has the positive side diodes and the negative

side diodes of each phase on the same heat sink. That is, in the W phase, the negative side diodes 10 and 11 are on the same heat sink 26.

It is also submitted that these distinctions are not obvious because the present invention used semiconductor switching devices where the temperature of operation is low compared to a conventional diode. Therefore there is a high cooling demand and it is important to reduce any imbalance of temperature among each switching device. As a result of the present invention the heat sinks are completely separated into positive and negative U, V, and W phases so that the imbalance of the temperature of each semiconductor switching device is reduced. In contrast Franz uses diodes as rectifiers so there is no suggestion or reason for completely separating into positive and negative U, V and W phases.

Accordingly, the presently claimed invention has a feature not shown by any of the references and there is no suggestion that one skilled in the art would modify Franz to meet this limitation.

The secondary reference to Sunaga does not disclose heat sinks separated into positive and negative ones of the phases, although Sunaga uses semiconductor switching devices. Certainly than there is no reason to modify Franz to completely separate the positive and negative portions of the U, V, and W phases.

Asao does not disclose heat sinks separated into U, V, and W phases.

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Therefore in view of the distinguishing feature between the claimed invention and the references of record which feature is not shown or disclosed by any of the references or their combination, Applicants request that this application, containing independent claims 1 and 2 and dependent claims 3,4 and 6-8, be allowed and be passed to issue.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #056208.52669US).

Respectfully submitted,

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